

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

DEMETRIUS THOMAS,)
)
Plaintiffs,) Case No. 4:18-CV-01566
)
v.) JURY TRIAL DEMANDED
)
CITY OF ST. LOUIS, et al.)
)
Defendants.)

CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO AMENDED
COMPLAINT

Defendant(s) herein move the Court for an extension of time to respond to plaintiff's amended complaint. In support of this motion, defendant(s) state:

1. This action is one of some 21 actions commenced against defendant City of St. Louis and various police officers.¹ These actions were filed in stages beginning in September 2018. These actions are in addition to several other actions, including one class action for injunctive relief, that are also pending in this District.

¹ The pending actions include: Rasheed Aldridge v. City of St. Louis, et al. 4:18-CV-01677; Fareed Alston v. City of St. Louis, et al. 4:18-CV-01569; Amir Brandy v. City of St. Louis, et al. 4:18-CV-01674; Brian Baude v. City of St. Louis, et al. 4:18-CV-01564; Crystal Brown v. City of St. Louis, et al. 4:18-CV-01676; Emily Davis v. City of St. Louis, et al. 4:18-CV-01574; Heather DeMian v. City of St. Louis, et al. 4:18-CV-01680; Alison Dreith v. City of St. Louis, et al. 4:18-CV-01565; Michael Faulk v. City of St. Louis, et al. 4:18-CV-00308; Darryl Gray v. City of St. Louis, et al. 4:18-CV-01678; Megan Ellyia Green v. City of St. Louis, et al. 4:18-CV-01629; Mark Gullet v. City of St. Louis, et al. 4:18-CV-01571; Calvin Kennedy v. City of St. Louis, et al. 4:18-CV-01679; Lindsey Laird and Andre Roberts v. City of St. Louis, et al. 4:18-CV-01567; Derek Laney v. City of St. Louis, et al. 4:18-CV-01575; Alex Nelson and Iris Nelson v. City of St. Louis, et al. 4:18-CV-01561; Dillan Newbold v. City of St. Louis, et al. 4:18-CV-01572; Mario Ortega v. City of St. Louis, et al. 4:18-CV-01576; Christopher Robertson v. City of St. Louis, et al. 4:18-CV-01570; Keith Rose v. City of St. Louis, et al. 4:18-CV-01568; Demetrius Thomas v. City of St. Louis, et al., 4:18-CV-01566; Jonathan Ziegler v. City of St. Louis, et al., 4:18-CV-01577.

2. Defendants were granted additional time to respond to the original complaints in all the referenced actions and filed motions to dismiss on December 19, 2018. Thereafter, plaintiffs filed amended complaints pursuant to F.R.Civ.P. 15(a)(1)(B) in every case on January 9, 2019.

3. Defendants' responses to the amended complaints are currently due January 23, 2019. Counsel have conferred with plaintiffs' counsel, and plaintiffs have no objection to extending the time for response by 10 days. Due to intervening weekends, such extension would require responses to be filed on or before February 4, 2019.

4. Defense counsel need additional time to evaluate the amended complaints and to determine to what extent, if at all, the plaintiffs' claims have been altered, requiring further tailoring of responses. Given the length of the complaints and exhibits, this review will consume considerable time, and counsel are involved in extensive discovery in other, related cases, as well as being subject to intervening trials and briefing deadlines in other cases.

5. This motion is not advanced for any improper purpose or solely to delay disposition of any action.

WHEREFORE, defendant(s) pray that the time for answer or other response to the amended complaint herein be extended to and including February 4, 2019.

Respectfully submitted,
JULIAN L. BUSH
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CERTIFICATE OF SERVICE

I hereby certify that on January 18, 2019, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system.

/s/ Robert H. Dierker 23671MO